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Via ECF

Honorable Colleen McMahon, U.S.D.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street – Courtroom 24A
New York, NY 10007-1312
(212) 805-6325

Re: *Brown v. NYC DOE, et al.*
Case Number: 1:20-cv-10948-CM

Dear Judge McMahon:

We represent the Plaintiff, Marina Brown, in the above-referenced action. We write today jointly with counsel for Defendants.

Specifically, we write further to the Court's directive that we provide updates every ninety (90) days as to the status of the State Court action. In that regard, as you might recall, the State Court has rendered a decision denying in part and granting in part Defendants' Motion to Dismiss. Defendants' have now submitted an Answer. The Parties have made significant strides towards a resolution in this matter, but have not yet reached a resolution. As the Court is aware, any settlement with the DOE has many logistical steps outside of the control of counsel. While the matter is not resolved, the Parties have had material movement and do not yet believe resolution cannot be obtained. Thus, the parties respectfully request that the Court extend this case's stay until September 1, 2023 to give the Parties a continued opportunity to settle.

We thank the Court for its time, attention, and courtesies in this regard.

Respectfully submitted,



Ethan Leonard (EL2497)

Cc: Kami Z. Barker (Via ECF and Electronic Mail on consent)